UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNDER SEAL

UNITED STATES OF AMERICA

Case No.

3:13-cr-00566-HA

INDICTMENT

TRAVIS JAMES STEPHENS,
JENNICA IRENE DUNN, and
RAMONA SPACEY CAMPBELL,
Defendants.

21 U.S.C. §§ 841(a)(1), 846 21 U.S.C. § 853 18 U.S.C. §§ 922(g)(1), 924(e) 18 U.S.C. §§ 924(c), 924(d) 28 U.S.C. § 2461(c)

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1: Conspiracy to Distribute Methamphetamine

Between May 2013 and December 2013, in Multnomah and Clackamas Counties, within the District of Oregon, TRAVIS JAMES STEPHENS and JENNICA IRENE DUNN, defendants herein, did knowingly and willfully combine, conspire, confederate and agree with each other and with others both known and unknown to the Grand Jury, to distribute methamphetamine, a Schedule II controlled substance, in an amount exceeding 50 grams or more of actual methamphetamine in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(viii) and 846.

COUNT 2: Distribution of Methamphetamine

On or about June 12, 2013, in Clackamas County, within the District of Oregon, defendants **TRAVIS JAMES STEPHENS and RAMONA SPACEY CAMPBELL** did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The Grand Jury further charges,

pursuant to Title 21, United States Code, Section 841(b)(1)(B)(viii), that this violation involved 5 grams or more of actual (pure) methamphetamine.

COUNT 3: Distribution of Methamphetamine

On or about July 19, 2013, in Multnomah County, within the District of Oregon, defendant **TRAVIS JAMES STEPHENS** did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The Grand Jury further charges, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(viii), that this violation involved 5 grams or more of actual (pure) methamphetamine.

COUNT 4: Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about July 19, 2013, in Multnomah County, within the District of Oregon, defendant **TRAVIS JAMES STEPHENS** did knowingly possess firearms: a Ruger revolver model SP101 and a Make Star pistol (model unknown), in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: distribution of methamphetamine (as alleged in Count 3), all in violation of Title 18, United States Code, Section 924(c).

COUNT 5: Felon in Possession of a Firearm (ACC)

On or about July 19, 2013, in Multnomah County, within the District of Oregon, defendant **TRAVIS JAMES STEPHENS**, having been convicted of crimes punishable by imprisonment for a term exceeding one year, specifically:

- A. Possession with the Intent to Distribute Methamphetamine, on or about May 2,
 2002, in the United States District Court (Oregon), Case Number 01-CR-449-BR;
- B. Felony Attempt to Elude, on or about January 24, 2001, in the State of Oregon for
 Multnomah County Circuit Court, Case Number 00-11-38844;
- C. Felony Attempt to Elude, on or about May 20, 1999, in the State of Oregon for
 Clackamas County Circuit Court, Case Number CR9900168; and
- D. Delivery/Manufacture of a Controlled Substance, on or about February 10, 1999,
 in the State of Oregon for Multnomah County Circuit Court, Case Number 98-11-39346;

did knowingly and unlawfully possess one or more of the following firearms, to-wit:

- 1. A Ruger revolver model SP101,
- 2. a Make Star pistol (model unknown)

which had previously been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT 6: Distribution of Methamphetamine

On or about September 30, 2013, in Multnomah County, within the District of Oregon, defendants **TRAVIS JAMES STEPHENS and JENNICA IRENE DUNN** did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The Grand Jury further charges, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(viii), that this violation involved 5 grams or more of actual (pure) methamphetamine.

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COUNT 7: Distribution of Methamphetamine

On or about October 9, 2013, in Multnomah County, within the District of Oregon, defendant **JENNICA IRENE DUNN** did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The Grand Jury further charges, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(viii), that this violation involved 5 grams or more of actual (pure) methamphetamine.

COUNT 8:Possession with Intent to Distribute Methamphetamine

On or about November 8, 2013, in Multnomah County, within the District of Oregon, defendants **TRAVIS JAMES STEPHENS and JENNICA IRENE DUNN** did knowingly and intentionally possess with the intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The Grand Jury further charges, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(viii), that this violation involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine.

CRIMINAL FORFEITURE -DRUG OFFENSE

As a result of committing the controlled substance offenses alleged in Counts 1-3, and 6-8 of this indictment, TRAVIS JAMES STEPHENS, JENNICA IRENE DUNN, and RAMONA SPACEY CAMPBELL, defendants herein, shall forfeit to the United States pursuant to Title 21 United States Code, Section 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations.

Page 4 - INDICTMENT, U.S. v. Travis Stephens et al.

CRIMINAL FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Counts 4 or 5 of this indictment, defendant **TRAVIS JAMES STEPHENS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), the firearms and all associated ammunition involved in that offense, including without limitation:

- 1. a Ruger revolver model SP101, and
- 2. a Make Star pistol (model unknown).

DATED this _____ day of December 2013.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL United States Attorney

LEAH K. BOLSTAD, OSB #052039 Assistant United States Attorney